

Strang, Steven

From: Strang, Steven [sstrang@gallaghersharp.com]
Sent: Tuesday, December 31, 2019 12:55 PM
To: 'Subodh Chandra'
Cc: Travis, John; 'Tim Dobeck'; Bloor, Paula; 'Ashlie Case Sletvold'
Subject: RE: Novak

Subodh,

Your written discovery is now overdue. As expressed below, we need the responses to evaluate the case before the case management conference. Please provide a firm date or we will notify the Court.

We have also told you repeatedly that we need your client's deposition before the case management conference – without it I do not see our liability analysis changing, and think that further settlement discussions will be a waste of time. Please either provide us with a date in early January or consider a joint order asking the Court to postpone the conference until we have what we need.

I am available Thursday and Friday should you wish to discuss.

Thanks,

Steven

Steven D. Strang, Esq.

Gallagher Sharp | Attorneys

Direct: Cleveland 216.522.1037 | Columbus 614.340.2296

Fax: 216.340.2301

sstrang@gallaghersharp.com

www.gallaghersharp.com

OSBA Certified Specialist, Insurance Law

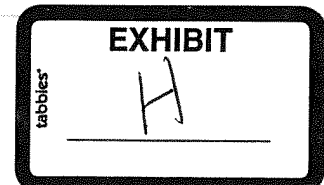


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From: Strang, Steven [mailto:sstrang@gallaghersharp.com]

Sent: Friday, December 20, 2019 12:22 PM

To: 'Subodh Chandra'



Cc: Travis, John; Tim Dobeck; Bloor, Paula; Ashlie Case Sletvold
Subject: RE: Novak

Subodh,

That is not acceptable. Please give us a deposition date before January 15. If not we will consider involving the Court.

We sent out discovery to receive responses this month, and have been asking for the deposition in early January for a month now. Your November 25 email asks that depositions take place after paper discovery is exchanged – our responses are due next week and you never sent any.

Judge Polster specifically allowed us to engage in discovery before the court conference, and that is exactly what we intend to do. We have spent two full days mediating this case at great expense and inconvenience to our clients, and do not want to waste another effort without getting any new information.

Thanks,

Steven

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Thank you for your cooperation.

From: Subodh Chandra [mailto:subodh.chandra@chandralaw.com]

Sent: Thursday, December 19, 2019 10:44 PM

To: Strang, Steven

Cc: Travis, John; Tim Dobeck; Bloor, Paula; Ashlie Case Sletvold

Subject: Re: Novak

Steven,

Please review my November 25 email to you on a separate email thread on this topic, which I thought

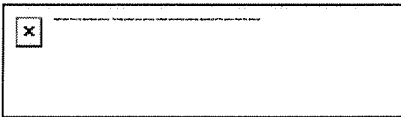
settled this issue. Since then, my schedule has filled.

I am also overscheduled attending to year-end activities at the firm going into the Holidays. We expect in early-to-mid January to be able to attend to finalizing Mr. Novak's responses to Defendants' written discovery requests and to send you our own requests around the same time. (I had hoped to have them out sooner, but too many events intervened.) We can schedule depositions after both sides have their complete discovery responses in hand. Assuming that Defendants provide complete and candid initial responses rather than cause needless fights, I suggest we set aside several days for several key depositions in mid-February. I propose February 11–13 and will hold those days on my calendar as best I can through the first week of January. That is a more workable and orderly schedule for this (and most) litigation.

I will be out in U.S. Magistrate Judge Selection Committee interviews for the Court all day tomorrow and only able to attend to email intermittently next week with extended family in town and skeleton staffing at the office as our personnel take a much-needed break.

Thank you for your patience. I look forward to engaging with you further on this matter in the New Year. Best wishes to you, your family, and clients for the Holiday Season.

Subodh Chandra
The Chandra Law Firm LLC
The Chandra Law Building
1265 W. 6th Street, Suite 400
Cleveland, OH 44113.1326
216.578.1700 office • 216.578.1800 fax • 216.965.6463 mobile
Subodh.Chandra@ChandraLaw.com
www.ChandraLaw.com
Twitter: @ChandraLawFirm • @SubodhChandra • Facebook: The Chandra Law Firm LLC



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On Wed, Dec 18, 2019 at 10:40 AM Strang, Steven <sstrang@gallaghersharp.com> wrote:

Subodh,

I am following up on the below. Please provide a few dates for your client's deposition in early January, before our conference with the Court.

Thanks,

Steven

Steven D. Strang, Esq.

Gallagher Sharp | Attorneys

Direct: Cleveland 216.522.1037 | Columbus 614.340.2296

Fax: 216.340.2301

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From: Strang, Steven [<mailto:ssstrang@gallaghersharp.com>]
Sent: Thursday, November 21, 2019 4:40 PM
To: 'Subodh Chandra'
Cc: Travis, John; Tim Dobeck; Bloor, Paula; Ashlie Case Sletvold
Subject: RE: Novak

Subodh,

I do not recall such a request, but no matter.

We would prefer to have answers to our written discovery. Please let us know your/his availability in early January.

Thanks,

Steven

Steven D. Strang, Esq.

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Direct: Cleveland 216.522.1037 | Columbus 614.340.2296

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From: Subodh Chandra [mailto:subodh.chandra@chandraalaw.com]

Sent: Wednesday, November 20, 2019 4:48 PM

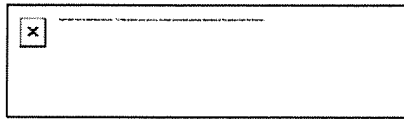
To: Strang, Steven

Cc: Travis, John; Tim Dobeck; Bloor, Paula; Ashlie Case Sletvold

Subject: Re: Novak

Although I first requested dates for the officers' deposition, I will accommodate your request: Let me know if Monday, December 2, 10 am works for you (assuming the deposition takes place in downtown Cleveland). Please tell us where. You're welcome to use our conference room, but I imagine you might want to use yours?

—
Subodh Chandra
The Chandra Law Firm LLC
The Chandra Law Building
1265 W. 6th Street, Suite 400
Cleveland, OH 44113.1326
216.578.1700 office • 216.578.1800 fax • 216.965.6463 mobile
Subodh.Chandra@ChandraLaw.com
www.ChandraLaw.com
Twitter: @ChandraLawFirm • @SubodhChandra • Facebook: The Chandra Law Firm LLC



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On Wed, Nov 20, 2019 at 1:37 PM Strang, Steven <sstrang@gallaghersharp.com> wrote:

Please see the attached.

Steven D. Strang, Esq.

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Direct: Cleveland 216.522.1037 | Columbus 614.340.2296

Fax: 216.340.2301

[sstrang@gallaghersharp.com](mailto:ssrang@gallaghersharp.com)

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